

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**CYNTHIA K. SATTERWHITE and
GASTROENTEROLOGY
SPECIALISTS, INC.,**

Defendants.

Civil Action No. 2:15-cv-111-RGD-DEM

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO RESPOND DEFENDANTS' DISCOVERY**

COMES NOW the Plaintiff, the United States of America, (hereinafter, "the United States"), by counsel, and moves this Court for an extension of time to respond to the discovery (Interrogatories and Request for Production of Documents) heretofore served by the Defendants on December 4, 2015 and to which a response would otherwise be due on or before January 4, 2016.

Without waiving, limiting or qualifying any of the United States' objections to the Defendants' discovery, heretofore served on counsel for the Defendants by hand delivery on December 21, 2015, the United States requests an extension of time of twenty-one (21) days to respond to said discovery, noting that the discovery relates, in large part, to matters undertaken, tasks performed and documents created by contractors and subcontractors to the United States Department of Defense (the Federal government Department which performed the investigation of the claims set forth in the Complaint), much of the information and many documents sought is/are not available locally, the broad (excessively) scope of the discovery seeks information and documents that is/are privileged or otherwise exempt from discovery and therefore every

document and item of information must be reviewed before a response can be made and the discovery is served at a time of the year when the Department of Defense and its contractors and subcontractors are limited in terms of personnel available to perform the tasks associated with making a response. Further, this Court's Order of November 17, 2015 gives the Defendants 120 days (until March 14, 2016) to file an Answer, a sufficient time to allow the Defendants to incorporate therein any information learned from the discovery response of the United States, even if that response is filed on or before January 25, 2016.

THEREFORE, the United States moves this Court for an Order extending its time to respond to Defendants' December 4, 2015 discovery to on or before January 25, 2016.

Respectfully submitted,

UNITED STATES OF AMERICA,
Plaintiff

DANA J. BOENTE
United States Attorney

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that, on the 29th day of December, 2015, I will electronically file the foregoing and PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND DEFENDANTS' DISCOVERY with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following filing user(s):

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